REMARKS

This Application has been carefully reviewed in light of the Office Action mailed on January 31, 2003. Claims 1 through 5, 7 through 12, and 14 through 32 are rejected under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 5,953,330 issued to Colmant, et al. ("*Colmant*"). Claims 6 and 13 are rejected under 35 U.S.C. §103(a) as being unpatentable over *Colmant* in view of U.S. Patent No. 6,005,865 issued to Lewis, et al. ("*Lewis*"). Applicants traverse the rejections of Claims 1 through 32 for reasons stated below. Reconsideration and favorable action are requested.

INFORMATION DISCLOSURE STATEMENT

The Examiner states that the IDSs filed on August 30, 2002 and November 21, 2002 fail to comply with 37 C.F.R. 1.98(a)(2), which requires a legible copy of the references listed. During a telephone conference with the Examiner on February 20, 2003, the Examiner clarified that the only IDS at issue is the one filed on August 30, 2002, and that only the non-patent documents listed in PTO form 1449, lines G-T of that IDS are requested. Applicants believe that the IDS filed on November 21, 2002 was properly submitted with copies of all associated references. Although Applicants believe that copies of all references associated with the IDS submitted on August 30, 2002, including the references identified in lines G-T, were properly submitted at that time, Applicants submit these identified references again, for the second time, to advance the prosecution of this case. Favorable action is requested.

OBJECTIONS TO THE DRAWINGS

In response to the Examiner's objection to the drawings, Applicants submit with this response a corrected drawing with the proposed changes made in red (See Request to Amend Drawings). A separate letter proposing the drawing correction is also enclosed. Reconsideration and favorable action are requested. Support for the addition to Figure 2 is found at page 11, lines 6-13 and page 13, lines 24-27.

SECTION 102 REJECTIONS

Claim 1 is allowable at least because *Colmant* does not teach or suggest "a switch controller operable to determine a type for each traffic cell [transported by a frame] received at the switch interface and to determine based on the type for a traffic cell an address for

storing the traffic cell in a switch memory . . . ," as recited by Claim 1. The Examiner identifies column 6, lines 35-44 of *Colmant,* which describes a controller 122, as showing this limitation. This is incorrect because controller 122 distinguishes between the types of frames, not between the types of cells that are transported by a frame. *Colmant* states "controller 122 manages the receive and transmit data by placing the data into eight-receive 214 and eight-transmit 216 queues (see FIGURE 5) operating as circular FIFO registers." Figure 5 reveals that queues 214 and 218 are each designated to store a particular type of frame in its entirety. For example, Table 1 shown in Figure 5A of *Colmant* discloses queues that are respectively designated for a synchronous frame, an asynchronous/MAC frame, and a SMT frame. Further, column 7, lines 30-52 states that the queues are designated based on particular frame types.[1] Because it is the controller 122 that is placing a received frame in its entirety into a queue assigned to the received frame, controller 122 may be operable to distinguish between the various frame types. However, controller 122 neither makes a distinction between the cells transported by a frame nor has a reason to do so. Therefore, controller 122 is at best a device that is operable to receive a frame and place the frame in its entirety into an assigned queue. It does not disclose a switch controller operable to determine a type for each of the traffic cells that are transported by a received frame and to determine an address for storing the traffic cell in a switch memory based on the determination of the type. Thus, Claim 1 is allowable. Reconsideration and favorable action are requested.

Claim 11 is allowable for reasons analogous to those provided in conjunction with Claim 1. More specifically, *Colmant* does not teach or suggest ". . . the switch controller operable to determine a type for the traffic cell based on the header [that is extracted by the switch interface from the time slot transporting the traffic cell and provided to the switch controller], to determine based on the type and address for storing the traffic cell in a switch memory, and to provide the address to the switch memory," as recited by Claim 11. Further, *Colmant* does not teach or suggest "a switch interface operable to . . . extract a header for a traffic cell from the time slot transporting the traffic cell, and to provide the header to a switch controller," as recited by Claim 11. The Examiner appears to rely on the disclosure of a system interface unit ("SIU") 128 of *Colmant* to show this missing limitation. This is incorrect. SIU 128 is a device that manages each frame as a whole. SIU 128 is not described

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[1] Column 7, lines 43-45 of *Colmant* states that "[F]our frame types are recognized and copied into separate queues: synchronous (Q0), asynchronous/MAC (Q1), and SMT frames (Q2)."

as a device operable to extract a header from the time slot [of a frame] that is transporting the traffic cell and to provide that header to a switch controller. Thus, Claim 11 is allowable. Reconsideration and favorable action are requested.

Claim 15 is allowable for reasons analogous to those provided in conjunction with Claim 1. More specifically, *Colmant* does not teach or suggest "determining a type for each traffic cell based on the header for the traffic cell; determining an address in the switch memory for storing the traffic cell based on the type . . . ," as recited by Claim 15. Reconsideration and favorable action are requested.

Claim 24 is allowable for reasons analogous to those provided in conjunction with Claim 1. More specifically, *Colmant* does not teach or disclose "software . . . operable to . . . determine a type for each traffic cell based on the header for the traffic cell, to determine an address in a switch memory for storing the traffic cell based on the type," as recited by Claim 24. Reconsideration and favorable action are requested.

As depending on allowable independent Claims 1, 11, 15, and 24, the respective dependent Claims 2-5, 7-10, 12, 14, 16-23, and 25-32 are also allowable. Claim 16 is also allowable because *Colmant* does not teach or suggest "extracting the header from the time slots at the switch interface; passing the header to a switch controller," as recited by Claim 16. Reconsideration and favorable action are requested.

SECTION 103 REJECTION

Claims 6 and 13 are rejected under 35 U.S.C. §103(a) as being unpatentable over *Colmant* in view of U.S. Patent No. 6,005,865 issued to Lewis, et al. ("*Lewis*"). However, Claims 6 and 13 are allowable at least because they depend from allowable independent Claims 1 and 11, respectively. Reconsideration and favorable action are requested.
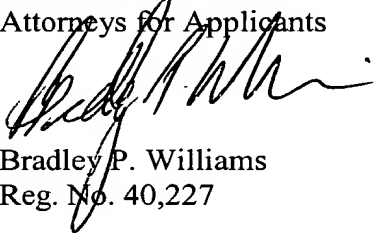
CONCLUSION

Applicants have made an earnest attempt to place this case in condition for allowance. For at least the foregoing reasons, Applicants respectfully request full allowance of all the pending claims.

If the Examiner feels that a telephone conference or an interview would advance prosecution of this Application in any manner, please feel free to contact the undersigned attorney for Applicants.

Enclosed is a check in the amount of $103.00 to cover the cost of one additional independent claim. The Commissioner is hereby authorized to charge any additional fees or credit any overpayments to Deposit Account No. 02-0384 of Baker Botts L.L.P.

Respectfully submitted,

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Date: March 20, 2003

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